

RECEIVED  
FARRIS BOBANGO, PLC  
2016 FEB 24 AM 3:27

ATTORNEYS AT LAW

Nashville · Memphis

T.R.A. DOCKET ROOM

414 UNION STREET, SUITE 1105  
NASHVILLE, TENNESSEE 37219

(615) 726-1200 telephone · (615) 726-1776 facsimile

Charles B. Welch, Jr.  
cwelch@farrismathews.com

Direct Dial:  
(615) 687-4230

February 23, 2016

*Hand Delivery*

Chairman Herb Hillard  
c/o Sharla Dillon, Dockets & Records Manager  
Tennessee Regulatory Authority  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

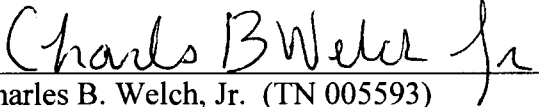
**Re: Docket No. 16-00001**

Dear Chairman Hillard:

Enclosed for filing are the original and four copies of Energy Freedom Coalition of America's Response to Kingsport Power February 19, 2016 Motion.

Thank you for your assistance regarding this matter. If you have any questions, or if I may be of further assistance, please do not hesitate to contact me.

Respectfully submitted,

  
Charles B. Welch, Jr. (TN 005593)  
FARRIS BOBANGO PLC  
414 Union Street, Suite 1105  
Nashville, TN 37219  
(615) 726-1200

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN RE: )  
)  
PETITION OF KINGSPORT POWER ) DOCKET NO. 16-00001  
COMPANY d/b/a AEP APPALACHIAN )  
POWER GENERAL RATE CASE )  
)

---

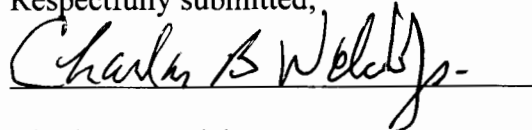
RESPONSE OF THE ENERGY FREEDOM COALITION OF AMERICA TO  
FEBRUARY 19, 2016 MOTION OF KINGSPORT POWER

---

The Energy Freedom Coalition of America ("EFCA") submits this response in opposition to the February 19, 2016 request submitted by Kingsport Power ("Kingsport") to re-set the due date for Intervenor's Pre-Filed Testimony.

At the February 18, 2016 Status Conference, the Hearing Officer recommended July 6, 2016 as the due date for Intervenor's Pre-Filed Testimony and July 27, 2016 as the due date for Kingsport's Rebuttal Testimony. These dates are reasonable and offer the parties sufficient time to prepare their case. Therefore, EFCA joins with the Consumer Advocate, TenneSEIA, and The Alliance for Solar Choice in asking the Hearing Officer to deny Kingsport's request to re-set the due date for Intervenor Pre-Filed Testimony. EFCA respectfully requests that the Hearing Officer memorialize the testimony dates discussed in the February 18<sup>th</sup> status conference in the anticipated procedural schedule.

Respectfully submitted,



Charles B. Welch Jr.  
BPR No. 5593  
(615) 726-1200 (voice)  
(615) 726-1776 (fax)  
cwelch@farris-law.com

Attorney for the Energy Freedom Coalition  
of America

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served via electronic email submission or regular U.S. mail to all parties of record in this proceeding on February 23, 2016.

William K. Castle  
Director, Regulatory Services VA/TN  
Three James Center  
1051 E. Cary Street, Suite 1100  
Richmond, VA 23219-4029  
wkcastle@aep.com

Wayne Irwin  
Office of the Attorney General  
P.O. Box 20207  
Nashville, TN 37202-0207  
wayne.irwin@ag.tn.gov

James R. Bacha, Esq.  
Hector Garcia, Esq.  
American Electric Power Service Corporation  
One Riverside Plaza  
P.O. Box 16637  
Columbus, OH 43216  
jrbacha@aep.com  
hgarcia1@aep.com

Joseph B. Harvey, Esq.  
Hunter, Smith, & Davis, LLP  
1212 N. Eastman Road  
P.O. Box 3740  
Kingsport, TN 37664  
jharvey@hdsdlaw.com

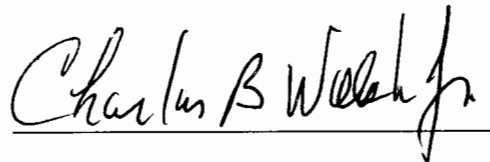
William C. Bovender, Esq.  
Hunter, Smith, & Davis, LLP  
1212 N. Eastman Road  
P.O. Box 3740  
Kingsport, TN 37664  
bovender@hdsdlaw.com

Michael J. Quinan, Esq.  
Christian & Barton, LLP  
909 East Main Street, Suite 1200  
Richmond, VA 23219  
mquinan@cblaw.com

Henry Walker, Esq.  
Bradley Arant Boult Cummings, LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
hwalker@babbc.com

Beren Argetsinger  
401 Harrison Oaks Blvd., Suite 100  
Cary, NC 27513  
bargetsinger@kfwlaw.com

James M. Van Norstrand  
275 Orchard Drive  
Pittsburgh, PA 15228  
jvannostrand@eq-research.com



Charles B. Welch Jr.